

8/30/04  
SKY

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

**USMS  
SCREENED**

DOCKET NO. 04 11572 JLT

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SUSAN COONEY,	)
	)
Plaintiff	)
	)
v.	)
	)
HUMANISTIC PSYCHOLOGY INSTITUTE,	)
d/b/a SAYBROOK INSTITUTE and	)
MAUREEN O'HARA, Individually	)
Defendants	)

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**AFFIDAVIT OF SUSAN COONEY IN SUPPORT OF PLAINTIFF'S OPPOSITION TO  
DEFENDANTS' MOTION TO DISMISS AND MOTION TO TRANSFER**

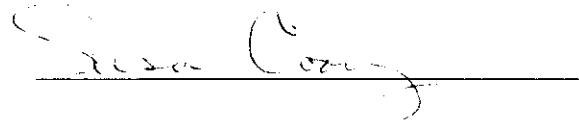
I, Susan Cooney, do depose and state as follows:

1. In or about 1995, I enrolled in Saybrook to pursue a Ph.D in psychology for the purpose of obtaining a license to practice psychology in the Commonwealth of Massachusetts.
2. Prior to my enrollment at Saybrook in 1995, and throughout my course of study from 1995 through 2002, I regularly advised staff and faculty of my intention to apply for a license to practice as a psychologist in Massachusetts. Saybrook faculty and staff repeatedly advised me that my studies at Saybrook would qualify me for licensure in Massachusetts.
3. Upon information and belief, during the period of 1995 to 1996, Saybrook was providing graduate training in psychology and/or related fields to other Massachusetts students, including but not limited to Dorothy Appelton (of Pepperell, MA), Richard Francis (of Acton, MA), Carol Maxym (of South Lee, MA), and Susan Schwartz (of Newton, MA).

4. Upon information and belief, during the period of 1997 to 2002, Saybrook was providing graduate training in psychology or related fields to other Massachusetts students, whose names and address are unknown to me, but available in Saybrook records.
5. During my years of study at Saybrook, I attended "residential conferences" at Saybrook's San Francisco campus for approximately two weeks each year.
6. At all other times, I conducted my graduate studies in psychology within the Commonwealth of Massachusetts. My professors and advisors provided guidance and instruction to me in Massachusetts via telephone, mail, and electronic communications.
7. I completed all academic requirements of Saybrook, including a dissertation, and I was awarded a Ph.D. in Psychology in 2002.
8. Upon information and believe, on various dates in 1999, 2000 and in other years, President O'Hara and other agents of Saybrook received communications from the Massachusetts Board of Registration of Psychologists (hereinafter "the Board") and other reliable sources that Saybrook students were ineligible for licensure in Massachusetts.
9. Defendant O'Hara was president of Saybrook at the time of some or all of these communications regarding Saybrook's failure to meet the Board's licensure standards.
10. Upon information and belief, in or about 1999 or 2000 and thereafter, President O'Hara knew or should have known that Saybrook students were ineligible for licensure as psychologists in Massachusetts.
11. During my studies at Saybrook from 1995 through 2002, neither President O'Hara nor any agent of Saybrook provided notice that Board would not license Saybrook students.

12. On various dates in 2002 and 2003, I was informed by the Board that I was ineligible for licensure in Massachusetts. I was also informed by the Board that Saybrook had received notice, during the time that I was a student, that Saybrook graduates were ineligible for licensure as psychologists.
13. On various dates in 2002 and 2003, I requested assistance from Saybrook through oral and written communications, including a Chapter 93A demand letter. Saybrook offered to defray up to \$2,500 of legal costs if I agreed to file suit against the Board and agreed to assume all legal costs in excess of \$2,500. Apart from its offer to defray a modicum of legal fees if I sued the Board, Saybrook has failed to take any action to assist me in obtaining licensure within Massachusetts.

Signed under the pains and penalties of perjury this 27<sup>th</sup> day of August, 2004.



Susan Cooney, Ph.D.